

June 9, 2025

Patrick Doherty, Compliance Program Manager  
Compliance Assurance Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street 20<sup>th</sup> Floor  
Sacramento, CA 95814

**BY ENERGY SAFETY E-FILING**

**SUBJECT:** Southern California Edison Company's Response to Notice of Violation  
- NOV\_CAD\_SCE\_CAC12\_20241120\_1543

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation – NOV\_CAD\_SCE\_CAC12\_20241120\_1543 received on May 13, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on November 20, 2024. SCE appreciates the Office of Energy Infrastructure Safety's (Energy Safety) efforts to identify, communicate and work together to resolve potential wildfire risks. The enclosed response describes corrective actions taken or planned by SCE to remedy the finding identified in the above notice and to prevent recurrence.

If you have any questions, or require additional information, please contact Liz Leano at 626-302-3662 or [Elizabeth.Leano@sce.com](mailto:Elizabeth.Leano@sce.com).

Sincerely,

//s//

Shinjini C Menon  
Senior Vice President of System Planning & Engineering  
Southern California Edison

## **SCE Response**

While SCE is not requesting a written hearing for the finding addressed in this response, SCE reserves the right to identify these facts and further explain its position in subsequent procedural stages and/or proceedings.<sup>1</sup> Although Energy Safety has the right to refer certain issues to the CPUC for an enforcement action, the finding in this Notice does not support such referral.<sup>2</sup>

### **Finding: Data Accuracy**

<b>Notice</b>	<b>Violation</b>	<b>Structures</b>
NOV_CAD_SCE_CAC12_20241120_1543	1	1467014E

### **Summary of Findings:**

Energy Safety's Notice states that in implementing 2024 WMP initiative 8.1.2.1.1 - Covered Conductor, SCE failed to provide accurate data in reporting that covered conductor was installed on Pole ID1467014E, Grid Hardening ID TD1756549-1467014E, at coordinates 34.208338, -117.103808.

Energy Safety did not provide a "risk" category."<sup>3</sup>

### **Response:**

Structure ID 1467014E required only guy anchor remediation to support adjacent pole lines with covered conductor and does not require covered conductor itself. This pole was included in the WMP Quarterly Data Report (QDR) because of SCE's current reporting process, which includes all structures pertaining to the work order design for covered conductor installations. Although included in the QDR, this pole is not reported as part of SCE's WMP covered conductor mileage and target.

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<sup>1</sup> Government Code Section 15475.4 anticipates a "hearing" process, which traditionally implies an in-person hearing affording parties the right to present evidence and examine witnesses.

<sup>2</sup> In the Notice, Energy Safety states that pursuant to Public Utilities Code section 8389(g), following receipt of SCE's response to this Notice and resolution of any disputes, this matter may be referred to the California Public Utilities Commission (CPUC) for its consideration of a potential enforcement action, as the CPUC deems appropriate. Notice, p. 2. The Notice discussed herein does not meet the requirement for Energy Safety referral for enforcement action to the CPUC based on the statutory requirements that Energy Safety referral be based on substantial compliance with WMPs. Energy Safety cites Public Utilities Code Section 8389(g) in support of a potential enforcement action. However, Section 8389(g) only provides for a possible enforcement action where "an electrical corporation is not in compliance with its approved wildfire mitigation plan." Public Utilities Code Section 8386.1 further specifies that penalties shall be assessed for failure to substantially comply with a WMP.

<sup>3</sup> Notice, p. 1.